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For the attention of Planning Case Officer
By Planning Register

To whom it may concern,

Representation in respect of planning application for Land at Bicester Road, Kidlington known as 'PR7a' (LPA reference 22/00747/OUT)

Quod are instructed by Oxford University Development Ltd ('OUD') to submit representations in respect of outline planning application (ref: 22/00747/OUT) submitted by Barwood Development Securities Limited and the Trustees of The Philip King Homes Trust ('the Applicant') for the development of land known as PR7a ('the Site'). OUD is preparing proposals for the nearby site, the land allocated by Policy PR8 of the Local Plan Part 1 Partial Review ('LPP1PR'). OUD therefore has a valid and keen interest in the development of this neighbouring Site and in ensuring that a co-ordinated approach is taken in the consideration of this and other nearby sites.

Significant growth is planned in the area north of Oxford to help meet Oxford's clear and growing housing needs, which it cannot meet itself. OUD is, in principle, strongly supportive of the Application as it makes a significant contribution to meeting this identified need, providing 370 homes. Whilst there is a clear case for the scale of development across the sites identified in the LPP1PR, it is essential that their development is properly co-ordinated and that there is a common approach to calculating what a fair and reasonable contribution to infrastructure is devised. In particular, it is important that the right infrastructure is delivered at the right time to support the planned growth – most notably transport infrastructure. Having reviewed the Application, we have concerns that the project does not sufficiently promote the use of sustainable transport modes and encourage the sort of modal shift that is needed to ensure a well-functioning transport system and help tackle the climate crisis. To do so requires careful, long-term planning that provides infrastructure to be funded and provided in a fair and coordinated way. OUD wish to stress the District Council's role in ensuring there is such a mechanism in place.

The key focus of our client's concern is the Transport Assessment ('TA'), which does not provide the necessary assurances and assessment to support such an application. Issues of cumulative assessment are important in this context. In this context, we support the representations made by Oxfordshire County Council (in their capacity as the Local Highways Authority) on the Application and also those of National Highways (dated 06 April 2022, 09 May 2022 and 27 May 2022). We do not



need to repeat their detail but we expand below the key points which we consider it important to address.

Transport Assessment

We wish to make four specific points:

- i. The TA establishes a transport baseline with reference to the 2011 Census data. Given the time that has elapsed since this data was collected, not to mention global events that have altered travel behaviour during this time, using the 2011 Census data is not considered a robust source of evidence. Up to date transport surveys should be undertaken and used to inform the TA.
- ii. The Highway Safety Review should include an assessment of the Cuttleslowe Roundabout, which is a key junction between the Kidlington and Oxford and one that experiences high levels of congestion.
- iii. The TA models the potential impact of the proposed development upon the local highway network based on just two junctions: the Site access; and the Bicester Road/ Oxford Road roundabout. We consider that it is appropriate and necessary to widen the scope of the assessment to include the junctions at Peartree, Wolvercote, Kidlington and Cuttleslowe roundabouts. Without this, the TA cannot ensure that the any significant impacts on the transport network are effectively mitigated.
- iv. The Highway Safety Review concludes with regard to the Bicester Road / Oxford Road roundabout that *“the PIC data does not indicate that there is an obvious highway safety problem associated with the roundabout.”* Such a conclusion contradicts not only the data within the TA itself (which is not considered up to date), but also overlooks the tragic death of a cyclist on this roundabout earlier this year. This roundabout is a key junction for all the ‘PR’ sites, though perhaps none more so than for PR7a. The County Council’s draft Local Transport and Connectivity Plan sets out the need to substantially increase the number of journeys made by bicycle. The Application, in its current form, would not create the conditions necessary to encourage people to travel by bicycle, which relies on providing a safe network of cycle paths. For this Application to be found acceptable by the Council, we consider it essential that provision is made in the section 106 obligation for fair and reasonable contributions to be made to comprehensive improvements to an agreed plan for this roundabout.

Cumulative Transport Assessment

The TA states at paragraph 6.7 that *“in addition to the sites included with the traffic flows provided by OCC, it was agreed to include the allocated site identified as PR7b, Land at Stratfield Farm.”* This is an insufficient approach. As an absolute minimum, the cumulative assessment should consider all those sites allocated by the Cherwell Local Plan Part 1 Partial Review. The assessment will also be



inadequate unless it includes sites that are allocated by the Oxford Local Plan to the north of the city (SP24, SP28 and SP52).

In the case of PR8, the cumulative assessment should the commercial floorspace to come forward on the site at Begbroke Science Park, as well as the residential and educational uses.

The Applicant suggests that no mitigation is necessary to the Bicester Road / Oxford Road roundabout (i.e., the only existing junction that has been modelled). Given the lack of clarity around the cumulative scenario that has been carried out, there can be no certainty that no mitigation is required at this junction.

It is strongly recommended that the TA is revised to address these omissions.

Connectivity

The site-specific policy as set out in Policy PR7a states that the Site should establish a connecting pedestrian, cycle, and wheelchair route from the Site across the Bicester Road and that it should comply with a Development Brief that includes an outline scheme for connection to (amongst others) Oxford Parkway Railway Station and Water Eaton Park and Ride. The redline boundary is such that there is uncertainty over whether any of these connections can be meaningfully provided and improved in a way that will encourage: firstly, a substantial shift towards walking and cycling as the first transport modes of choice; and secondly to avoid conflicts between pedestrians and cyclists.

It is notable that there is a lack of any mention of the Kidlington Local Cycling and Walking Infrastructure Plan. Whilst we do not suggest that the proposals are not in accordance with the plan, we consider it would benefit the strength of the Application to demonstrate an understanding of it as a material consideration. We would also echo the comments made by the County Council that insufficient thought has been given to potential connectivity to local schools. A better understanding of the Kidlington LCWIP would help in this regard.

Summary

Whilst we support the principle of the proposed development in helping meet Oxford's unmet housing need, further information is necessary before any application for planning permission could be approved. Key to this is improving the Transport Assessment, which currently has an insufficient scope to ensure that potential impacts arising from the Site are properly assessed and (if needed) mitigated.

Once a more comprehensive assessment has been carried out and potential mitigation options considered, it will then be necessary to consider how the Applicant can reasonably and fairly contribute to these offsite mitigation measures. OUD wish to stress the need for ensuring that the growth in the north of Oxford area is properly supported by the necessary infrastructure. A recommended approach is for the District Council to implement a mechanism that can be used by all applicants of major development proposals in the area (namely the PR sites).



I trust that the above is helpful in your consideration of the Application. Should you require clarification on any of the points raised, please do not hesitate to contact me.

Yours sincerely



Gregory Markes
Senior Planner

cc. Tom Clarke (OUD)
Sebastian Balcombe (OUD)